

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
Civil Case No. 3:16-cv-00695

Baronius Press, Ltd.)
Plaintiff,)
)
v.)
)
)
Saint Benedict Press LLC,)
)
Defendant.)
)

PLAINTIFF'S MEMORANDUM OF LAW IN SUPPORT OF IT'S
MOTION FOR SUMMARY JUDGMENT
EXHIBIT APPENDIX

EXHIBIT	DESCRIPTION
A	Defendant's documents produced as SBPP-04049-04050
B	Defendant's documents produced as SBPP-00221-00222
C-1	Defendant's documents produced as SBPP-02094-02107 (Asset Purchase Agreement)
C-2	Defendant's document produced as SBPP-02030 (Exhibit E thereto)
C-3	Defendant's document produced as SBPP-02062-02065 (Exhibit D thereto)
D	Defendant's document produced as BP 00356 ("Copyright Assignment Agreement" between Mercier Press and Plaintiff dated October 3, 2010)
E	Plaintiff's documents produced as BP 00350 to BP 00351 (Contract between Bischofliches Seminary St. Willibald and Nova & Vetera e.K. dated November 16, 2008)
F	Plaintiff's documents produced as BP 00352 to BP 00357 (Contract between Nova & Vetera e.K. and Plaintiff dated February 2, 2009)
G	Defendant's 30(b)(6) Deposition Transcript
H	Plaintiff's documents produced as BP 00830-00831 (Underlying contract between Mercier Press and Herder-Saint Louis (predecessor of B. Herder), provides in Article 6 that (in translation) "When the last edition of the English translation two years is out of print, without that it will be reissued, Herder Freiburg translation rights fall back.")
I	Defendant's document produced as SBPP-00251
J	Plaintiff's document produced as BP03669
K	Plaintiff's document produced as BP03670
L	Defendant's document produced as SBPP-02238